

## REMARKS

In view of the above amendments and following remarks, favorable reconsideration in this application is respectfully requested.

The Examiner rejects claims 1, 8, 10, 12-20, 22-31, 36-38, 44-45 under 35 U.S.C. §103 as being unpatentable over Lynde (Patent No. 6,181,302).

Claims 1 and 22 have been amended to require that the identifications are arranged in a pyramid representation in which at least one common annotation which is displayed at a coarser scale has a plurality of offsprings which are only displayed at a finer scale. Support for this limitation is found, for instance, at paragraph 0036 of the published application.

Lynde does not mention or even suggest a pyramid representation of the annotations, as claimed. The pyramid representation allows, for example, to display the name of a village at a coarser scale, and to replace this name by names of individual streets or highlights when the village is displayed at a finer scale.

In addition, claim 38 has been amended to require that the identification is based on visual cues using computer vision. Support can be found, for instance, at paragraph 0047 of the published application. Visual cues and computer vision are not disclosed by Lynde. In contradiction to the examiner, col. 4, line 6-8, col. 5, line. 63, 64 do not anticipate this feature. In Lynde, the annotations are based on the azimuth, inclination and magnification obtained exclusively from sensors or instruments. For instance, Fig 12 of Lynde shows various sensors

used for calculating a new field of view and for creating the overlay. In addition, claim 1 of Lynde is limited to a system comprising an azimuth sensor and other instruments disposed onboard, used for generating a virtual image.

Azimuth, inclination and magnification are relatively easy to obtain from sensors and instruments on a ship, as in the example disclosed by Lynde, but much more difficult to determine with the required accuracy in other environments, such as in a museum or with a mobile equipment.

In any case, Lynde does not use any visual cues from the image, and the annotations are not based on computer vision. Computer vision has a clear, unambiguous signification for the one skilled in the art; Wikipedia defines computer vision as the “science and technology of machines that see. As a scientific discipline, computer vision is concerned with the theory for building artificial systems that obtain information from images.”

Thus, claim 38 is concerned with a method in which the identification of the element is based on information retrieved from the image itself, for example using automatic image feature recognition, as disclosed in paragraph 37 and figure 8. This has nothing to do with the identification of element based exclusively on azimuth sensors or on other instruments, as described and claimed in Lynde.

In fact Lynde does not store or process any digital representation of the view, and merely makes an optical overlay of additional information over an image seen through the goggles. It is thus not possible in Lynde to use any visual cue from the view, or to base information on cues.

Computer vision is not possible either, since computer vision requires an image in a format which can be processed by a computer; such a computer image is not available and not required in Lynde.

Claim 44 has been amended to require that the steps of obtaining and relating are performed automatically. Capturing a view with a mobile phone including a camera is not disclosed in Lynde, nor in any other document. The optical superimposition system used in the goggles of Lynde can not be adapted to a portable phone without substantial modifications which are not suggested in any cited document.

The examiner does not cite any prior art to show that mobile phones with a camera and sufficient processing power were available at the filing date of the application. The prior art of record merely shows that automatic annotations of a view requires expensive, bulky computers, workstations or professional goggles in a ship. There is no suggestion in the prior art that automatic annotation would be possible or even desirable in a mobile equipment such as a portable phone.

Claim 45 has been amended to require that the obtaining and relating steps are performed automatically. Again, Lynde does not generate a digital image, but only makes an optical superimposition of the annotations over a view seen through the goggles. This has nothing to do with integration of the view with the data into a digital image (which can then be stored, printed or otherwise processed).

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In the event there are any questions relating to this Amendment or to the application in general, it would be appreciated if the Examiner would telephone the undersigned attorney concerning such questions so that the prosecution of this application may be expedited.

Please charge any shortage or credit any overpayment of fees to BLANK ROME LLP, Deposit Account No. 23-2185 (123593.00106). In the event that a petition for an extension of time is required to be submitted herewith and in the event that a separate petition does not accompany this response, Applicants hereby petition under 37 CFR 1.136(a) for an extension of time for as many months as are required to render this submission timely. Any fee due is authorized above.

Respectfully submitted,

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